

# Arent Fox

February 25, 2011

VIA ECFS

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: CPNI Certification, EB 06-36

Dear Ms. Dortch:

On behalf of Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC, enclosed please find the companies' annual CPNI certification for filing in the above-referenced docket. Please contact me at (202) 857-6104 if you have any questions regarding this filing.

Respectfully submitted,

/s/

Katherine E. Barker Marshall

Attachment

cc: Best Copy and Printing (via e-mail)

**Katherine E. Barker Marshall**

Attorney

202.857.6104 DIRECT

202.857.6395 FAX

marshall.katherine@arentfox.com

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket No. 06-36**

Annual Section 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010.

Date Filed: February 25, 2011

Name of companies covered by this certification:

- Conterra Ultra Broadband, LLC (Filer ID 823694)
- Conterra Wireless Broadband, LLC (Filer ID 826946)

Name and Title of Signatory: Eric Burgess, Executive Vice President and Chief Financial Officer, Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC


I, Eric Burgess, certify that I am an officer of both Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (for purposes of this certification, collectively referred to as "Conterra" or the "Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company did not take any actions (proceedings instituted or petitions filed by the Company at either state commissions, in the court system, or at the Commission) against data brokers during 2010. The Company did not receive any customer complaints during 2010 concerning the authorized release of CPNI.

The Company does not have any information outside of the information filed in Docket No. 96-115 or that is publicly available regarding the processes that pretexters are using to attempt to access CPNI. The Company has taken steps to protect CPNI, which are highlighted in the attached document.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
Eric Burgess  
Chief Financial Officer  
Conterra Ultra Broadband, LLC  
Conterra Wireless Broadband, LLC

Date: 2 / 25 / 11

**Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC**  
**Statement Regarding Customer Proprietary Network Information Operating Procedures**

Conterra Ultra Broadband, LLC and Conterra Wireless Broadband, LLC (collectively “Conterra”), in accordance with section 64.2009(e), submit this statement summarizing how Conterra’s operating procedures are designed to ensure compliance with the Commission’s CPNI rules. Each company provides exclusively broadband (backhaul) services to schools and libraries and other carriers. This statement summarizes the procedures that each company has implemented to safeguard the CPNI of its respective customers.

Conterra values its customers’ privacy, and takes measures to ensure that it protects CPNI. It is Conterra’s policy to protect the confidentiality of its customers’ information. Conterra does not use, disclose, or permit access to its customers’ CPNI except as such use, disclosure, or access is permitted under Section 222 of the Communications Act of 1934, as amended, and the Commission’s implementing rules.

As necessary, Conterra may use CPNI for the permissible purposes enumerated in the Act and the Commission’s rules, including, but not limited to, initiating, rendering, billing, and collecting for telecommunications services. The company also may use CPNI to protect its rights or property.

Conterra has a process in place for verifying its customers’ identity during an in-bound call. Conterra does not release call detail information during an in-bound call.

Conterra trains its personnel in the use of CPNI. Conterra has an express disciplinary process in place for violation of the company’s CPNI policies.

Conterra does not use CPNI to market products and services to customers outside of the category of service to which the customer already subscribes. Conterra also does not share CPNI with its affiliates or third parties for marketing purposes. If, in the future, Conterra seeks to use CPNI for these purposes, then it will provide the appropriate notice to customers and will maintain a list of customer preferences. Conterra also will maintain a record of any marketing campaign in accordance with the Commission’s rules.

Conterra takes reasonable measures to discover and protect against attempts to gain against unauthorized access to CPNI. Conterra has practices and procedures in place to notify law enforcement, and customers, if permitted, of a security breach that results in the unauthorized access to, use, or disclosure of CPNI. Conterra will maintain a record of the notification in accordance with the Commission’s rules.

Conterra has designated an officer, as an agent for the company, to sign and file a CPNI compliance certificate on an annual basis.